

EXHIBIT 1

FILED: NEW YORK COUNTY CLERK 07/22/2021 10:10 AM

INDEX NO. 654534/2021

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 07/22/2021

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK-----X
NUKY CONSTANTINI,

Plaintiff,

SUMMONS

~~-against-~~

Index No:

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANYDefendant.
-----X

Plaintiff designates NEW YORK County as the place of trial.

The basis of the venue is place of business

Defendant's place of business: 277 Park Ave, New York, NY 10172

Defendant.

TO THE ABOVE NAMED DEFENDANT(S):

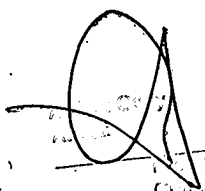
YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiffs' Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if the summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York
July 21, 2021

THE DRATCH LAW FIRM, PC
Attorney for Plaintiff

By: Brian M. Dratch, Esq.
233 Broadway, Suite 1800
New York, New York 10279

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Clerk of the Court

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Defendants' Address:

277 Park Ave
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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
NUKY CONSTANTINI,

Index No.

Plaintiff,

-against-

COMPLAINT

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY

Defendant.
-----X

Plaintiff by her attorneys THE DRATCH LAW FIRM, P.C. , complaining of the
defendant alleges as follows:

THE PARTIES

1. At all times hereinafter mentioned, the plaintiff resides in Yonkers, New York.
2. Upon information and belief, Hartford Life and Accident Insurance Co. is a corporation organized and existing under the laws of the State of Connecticut licensed to transact business in the State of New York with its principle place of business located at One Hartford Plaza Hartford, CT 06155 Connecticut 21822

AS AND FOR THE FIRST CAUSE OF ACTION

3. Plaintiff was employed by a law firm known as the Law Office of John Tropp.
4. Upon information and belief, the law firm maintained a long term disability policy with defendant to which plaintiff was a beneficiary of same.
5. In or about November of 2017 and continuing to date, plaintiff has become disabled due to a number of medical conditions.
6. Plaintiff made a claim for long term disability pursuant to the terms and

conditions of the policy with defendant.

7. Plaintiff has duly demanded payment pursuant to the terms of the contract, however, defendant has refused and/or neglected to make payment.

8. Accordingly, defendant has breached their contract with plaintiff.

WHEREFORE, plaintiff demands judgment against defendant in the First Cause of Action for the following:

(a) damages exceeding the in the sums which exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

(b) interest;

(c) costs of suit; and

(d) such other relief as the court deems just and proper.

Dated: New York, New York
July 21, 2021

THE DRATCH LAW FIRM
Attorneys for Plaintiff
233 Broadway, Suite 1800
New York, New York 10279
(212) 579-1808

BY:

Brian M. Dratch